

**REITLER KAILAS & ROSENBLATT LLP**

885 Third Avenue, 20th Floor

New York, New York 10022

Main: 212-209-3050

Fax: 212-371-5500

Email: [plicalsi@reiterlaw.com](mailto:plicalsi@reiterlaw.com)

*Attorneys for Plaintiff Lynne Freeman*

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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LYNNE FREEMAN, an individual,

Plaintiff,

-against-

TRACY DEEBS-ELKENANEY P/K/A TRACY WOLFF, an individual, EMILY SYLVAN KIM, an individual, PROSPECT AGENCY, LLC, a New Jersey limited liability company, ENTANGLED PUBLISHING, LLC, a Delaware limited liability company, MACMILLAN PUBLISHERS, LLC, a New York limited liability company, UNIVERSAL CITY STUDIOS, LLC, a Delaware limited liability company

Defendants.

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Case No. 1:22-cv-2435

**NOTICE OF MOTION FOR  
ADMISSION OF MARK D.  
PASSIN *PRO HAC VICE***

**PLEASE TAKE NOTICE** that, upon the attached Affirmation of Paul LiCalsi, dated March 28, 2022, and the exhibits attached thereto, Plaintiff Lynne Freeman, by her attorneys, Reitler Kailas & Rosenblatt LLP, hereby move this Court before the Honorable Analisa Torres of the United States District Court for the Southern District of New York, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York, 10007, for an Order pursuant to Rule 1.3(c) of the Local Civil Rules for the Southern and Eastern Districts of New York admitting Mark D. Passin, Esq., *pro hac vice*, to act as co-counsel for Plaintiff in the above-captioned action.

Applicant's Contact Information:

Mark D. Passin, Esq.  
CSReeder, PC  
11766 Wilshire Boulevard, Suite 1470  
Los Angeles, CA 90025  
(310) 861-2475  
mark@csrlawyers.com

Dated: New York, New York  
March 29, 2022

Respectfully submitted,

**REITLER KAILAS &  
ROSENBLATT LLP**

By: /s/ Paul LiCalsi

Paul LiCalsi  
885 Third Avenue, 20th Floor  
New York, New York 10022  
Main: 212-209-3050  
Email: [plicalsi@reiterlaw.com](mailto:plicalsi@reiterlaw.com)

*Attorneys for Plaintiffs*